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Counsel for Defendants
GOOGLE LLC and ALPHABET INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

JILL LEOVY, individually, and on behalf of
all others similarly situated,

Plaintiff,

v.

GOOGLE LLC,

Defendant.

CASE NO.: 5:23-cv-03440-EKL

**DECLARATION OF PAUL J.
SAMPSON IN SUPPORT OF
DEFENDANTS GOOGLE LLC AND
ALPHABET INC.'S MOTION TO
CONSOLIDATE**

Date: December 18, 2024

Time: 10:00 a.m.

Courtroom: 7

Judge: Hon. Eumi K. Lee

JINGNA ZHANG, an individual; SARAH
ANDERSEN, an individual; HOPE
LARSON, an individual; and JESSICA
FINK, an individual,

Individual and Representative
Plaintiffs,

v.

GOOGLE LLC and ALPHABET INC.,

Defendants.

CASE NO.: 5:24-cv-02531-EKL

1 I, Paul J. Sampson, declare as follows:

2 1. I am Of Counsel at the law firm of Wilson Sonsini Goodrich & Rosati, P.C., counsel
3 for Defendants Google, LLC and Alphabet, Inc. (collectively, “Defendants”) in this matter. I
4 submit this declaration in support of Defendants’ Motion to Consolidate. I have personal
5 knowledge of the facts set forth herein and, if called as a witness, I could and would testify
6 competently thereto.

7 2. Attached hereto as **Exhibit A** is a true and correct copy of Plaintiffs’ Initial
8 Disclosures Pursuant to Federal Rule of Civil Procedure 26, dated September 24, 2024, and served
9 by Plaintiffs in *Zhang v. Google LLC*, No. 5:24-cv-02531-EKL. In these initial disclosures, the
10 *Zhang* Plaintiffs identify 23 of Defendants’ executives and employees by name and claim that
11 these individuals and additional “unknown executives and employees” of Google and Alphabet
12 possess information relevant to their lawsuit, including information broadly concerning
13 Defendants’ generative artificial intelligence efforts. *See* Ex. A at 3-10; *see also id.* at 3 (“Details
14 regarding the technical development and deployment of AI models at Google”); *id.* at 3-4
15 (“Insights into Google’s AI research strategies, model training processes, and the use of large
16 datasets, including potentially copyrighted materials, for training AI.”); *id.* at 6 (“Details on the
17 technical aspects of deep learning and model training processes, as well as the ethical implications
18 of AI development involving potentially copyrighted materials.”); *id.* at 10 (“Details about internal
19 communications, discussions, or directives concerning AI ethics, data governance, and the
20 deployment of generative AI technologies.”).

21
22 I declare under penalty of perjury under the laws of the United States of America that the
23 foregoing is true and correct. Executed on October 9, 2024.

24 /s/ Paul J. Sampson

25 Paul J. Sampson
26 psampson@wsgr.com

27 *Counsel for Defendants*
28 GOOGLE LLC and ALPHABET INC.

SIGNATURE ATTESTATION

I, David H. Kramer, am the ECF User whose ID and password are being used to file this document. In compliance with N.D. Cal. Civil L.R. 5-1(i)(3), I hereby attest that the concurrence in the filing of this document has been obtained from the other signatory.

By: /s/ David H. Kramer
David H. Kramer